

1 I, Robert Clarke, declare as follows:

2 1. I am of sound mind, over the age of 18, and have authority to make this
3 declaration on behalf of the Defendant the National Notary Association (“NNA”).
4 The matters set forth in this declaration are based on my personal knowledge or my
5 personal investigation and review of relevant records.

6 2. My current title is Chief Financial Officer and Vice President of
7 Finance. In this role, my duties include overseeing the financial operations of the
8 NNA, guiding its financial strategy and planning, and maintaining its fiscal stability.
9 In this role, I collaborate with the executive management team to establish long-
10 range goals, strategies, plans, and policies. Other key responsibilities include
11 financial management, strategic planning, financial reporting, oversight of legal
12 matters, compliance, and risk management.

13 **Background About the National Notary Association**

14 3. The NNA is the preeminent professional association for the American
15 Notary, and the ultimate source for every notarial need.

16 4. As the foremost authority on the American Notary office, the NNA is
17 dedicated to imparting knowledge, understanding and unity among all notaries, and
18 instilling in them the highest ethical standards of conduct and sound notarial
19 practices.

20 5. The NNA is a national organization which provides commission and
21 renewal programs for notaries in all 50 states and the District of Columbia.

22 6. The NNA’s primary products and services include: public advocacy,
23 insurance and bond products, notary supplies, education and training programs, and
24 online databases.

25 7. Public Advocacy: A core mission of the NNA is notary advocacy. The
26 NNA engages on issues of importance to the notary community at both the state and
27 federal levels. As just one example, the NNA developed the Model Notary Act which
28 reflects best practices for how states should manage notary commissions. Over time,

1 the NNA has updated the Model Notary Act multiple times and, as a result, 30 to 40
2 states have adopted the Model Act in full or in part as a framework for their own
3 state notary regulations.

4 8. Insurance and Bond Products: A majority of jurisdictions require
5 notaries to carry either a notary bond or notary errors and omissions (E&O)
6 insurance. For example, California requires every notary to obtain a \$15,000 surety
7 bond. Even in states where insurance is not required, a notary bond or insurance
8 product will protect the notary against mistakes and false claims. The NNA sells
9 these insurance and bond products to our notary constituents.

10 9. Notary Supplies: The NNA sells a variety of products that aid notaries
11 in carrying out their official notarial duties. These products include, among others:
12 stamps, journals, certificates, thumb printers, handbooks, electronic notary products,
13 and security and privacy products. Some state laws require notaries to have these
14 products.

15 10. Education and Training Programs: The NNA provides training and
16 education programs to allow individuals to become a notary and renew their notary
17 commission specific to the state or jurisdiction in which they seek their commission.

- 18 a. The NNA training and education programs are available both online
19 and in live courses in California.
- 20 b. The NNA also offers an annual conference for notaries which
21 includes training components and deeper dives into notary training.
- 22 c. The NNA programs are designed to meet the legal requirements to
23 become a notary (or renew a commission for an existing notary).
24 Depending on the state and selected program, this may include
25 application forms, background checks, checklists, written materials,
26 and interactive learning content.

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Checklist: California Notary Commission Process

California Notary requirements and step-by-step instructions on how to become a Notary and get commissioned by the California Secretary of State.

[View the Checklist](#)

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Figure 1, see <https://www.nationalnotary.org/california/become-a-notary> (last accessed on March 3, 2025).

11. Professional Notary Directory: The NNA provides individuals certified through the Notary Signing Agent program with access to its online database, where clients can search for signing agents. The NNA also offers the “Find a Notary” service, which functions as an on-demand directory for notaries where potential clients can find, contact, and schedule appointments with them through the website.

The NNA’s Online Education Programs.

12. As set forth above, one of the several missions of the NNA is to educate and train notaries and serve as a resource to them.

13. To this end, the NNA offers its training and education programs online in all states and live in California, and through in-person and online conferences.

14. I understand that Plaintiff Teresa Turner (“Ms. Turner”) filed her complaint in this case on January 15, 2025. At the direction of my counsel, I have observed the NNA’s data related to Ms. Turner for the two years preceding the filing of this action (the “Relevant Time Period”).

15. First, I note that online education programs comprise of only 10% or less of the NNA’s total sales during the Relevant Time Period.

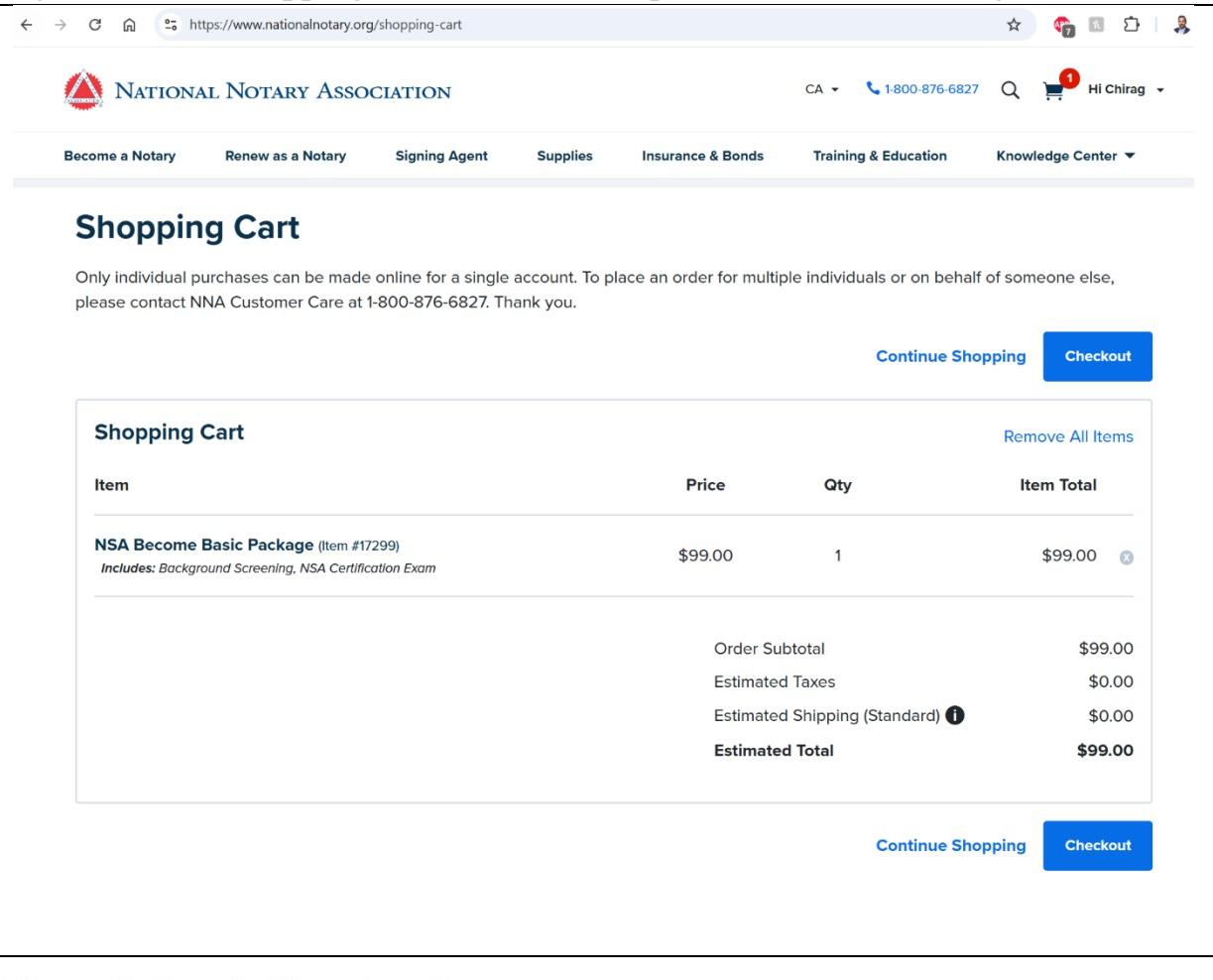
16. Next, my review of the NNA records revealed that during the Relevant Time Period, the only programs that Ms. Turner obtained from the NNA were the

1 NNA's notary signing agent certification and continuing education training program,
2 titled "NSA CE" and "NSA Online" (referred to as the "NSA Certification"). These
3 programs make up approximately 1% of the NNA's total sales during the Relevant
4 Time Period.

5 **The Website Does Not Collect or Disclose "Private Video Information"**

6 17. Online education and training programs may be purchased from the
7 NNA's website ([nationalnotary.org](https://www.nationalnotary.org)) ("Website"). However, as explained further
8 below, the programs are hosted or delivered on an entirely separate third-party
9 platform.

10 18. To purchase an online education program, a user must add their desired
11 program to their shopping cart, and then complete the "Checkout Page:"



A screenshot of a web browser displaying the National Notary Association's shopping cart page at <https://www.nationalnotary.org/shopping-cart>. The page shows a single item in the cart: the "NSA Become Basic Package" (Item #17299), which includes Background Screening and NSA Certification Exam. The price is \$99.00, and there is one item in the quantity. Below the cart summary, there are estimated totals: Order Subtotal (\$99.00), Estimated Taxes (\$0.00), Estimated Shipping (Standard) (\$0.00), and an Estimated Total of \$99.00. At the bottom of the page, there are "Continue Shopping" and "Checkout" buttons.

Shopping Cart				Remove All Items
Item	Price	Qty	Item Total	
NSA Become Basic Package (Item #17299) <small>Includes: Background Screening, NSA Certification Exam</small>	\$99.00	1	\$99.00	

Order Subtotal \$99.00
Estimated Taxes \$0.00
Estimated Shipping (Standard) ⓘ \$0.00
Estimated Total \$99.00

27 **Figure 2, Sample Shopping Cart**

The screenshot shows a web browser window for the National Notary Association's website at <https://www.nationalnotary.org/checkout>. The page is titled "Checkout".
Commission Information: Step 1 of 1.
Notary Address: Required *
Saved Addresses: Select Address dropdown.
First Name *: John
Middle Name:
Last Name *: Doe
Suffix:
Address 1 *: 123 Street
Address 2:
City *: [REDACTED]
State *: [REDACTED]
ZIP Code *: [REDACTED]
County *: Clackamas
Phone Number *:
Order Summary:
Your taxes and shipping total will be finalized once you enter a shipping address and choose a shipping method.
Your order contains 1 item:

Order Subtotal	\$299.00
Taxes	\$0.00
Shipping (Standard)	\$16.00
Total	\$315.00

Commission Information:
Notary Address: John Doe
123 Street
[REDACTED]
County: [REDACTED]
Commission Status: I am not a notary

Figure 3, Sample Checkout Page

19. Although the Meta Pixel was implemented on the NNA's Website during the Relevant Period, the NNA was intentional in its implementation to limit the type of data Meta received and specifically configured the Pixel **not** to allow Meta to collect the names of the online education and training programs purchased on its Website. Specifically:

20. As to URLs of the Shopping Cart and Purchase Pages:

- a. When a visitor places a program in their shopping cart, the shopping cart has a generic URL (nationalnotary.org/shoppingcart). See **Figure 3**. Thus, Meta does not receive a URL containing the name of the program that the user intends to purchase.

1 b. When a visitor proceeds to the checkout page, that check out page
2 also has a generic URL (nationalnotary.org/checkout). *See Figure*
3 3. Thus, Meta does not receive a URL containing the name of the
4 program the user has purchased.

5 21. As to the Contents of Shopping Cart and Purchase Pages: Meta does
6 not have access to the names of online education and training programs that are in a
7 visitor's shopping cart or that are purchased by the visitor, because the data field for
8 the "course_name" was a numeric field (Float) (i.e., a random set of numbers) rather
9 than a text field (String) (i.e., as text that describes the course names), as
10 demonstrated in *Figure 4*, below.

<input type="checkbox"/> Facebook - LDU Compliant Pixel	Custom HTML	CCPA Banner Opt Event	Facebook	a month ago	
<input type="checkbox"/> Facebook - Revenue Tracking	Custom HTML	Transaction Complete	Facebook	a month ago	
<input type="checkbox"/> Facebook Pixel	Custom HTML	All Pages Transaction Complete Exceptions: CCPA Banner Opt Event CCPA Cookie Value Opt out	Facebook	a month ago	

18 *Figure 4*, Screenshot of BigQuery Data Analysis of Shopping Cart/Purchases
19 Pages

20 22. The Meta Pixel did not collect any other details unless explicitly
21 configured to do so (which it was not during the Relevant Time Period).

22 23. In short, the Pixel was never deployed on a page or in a manner that
23 would allow Meta to collect information related to a user's purchase of an
24 educational program from the Website.

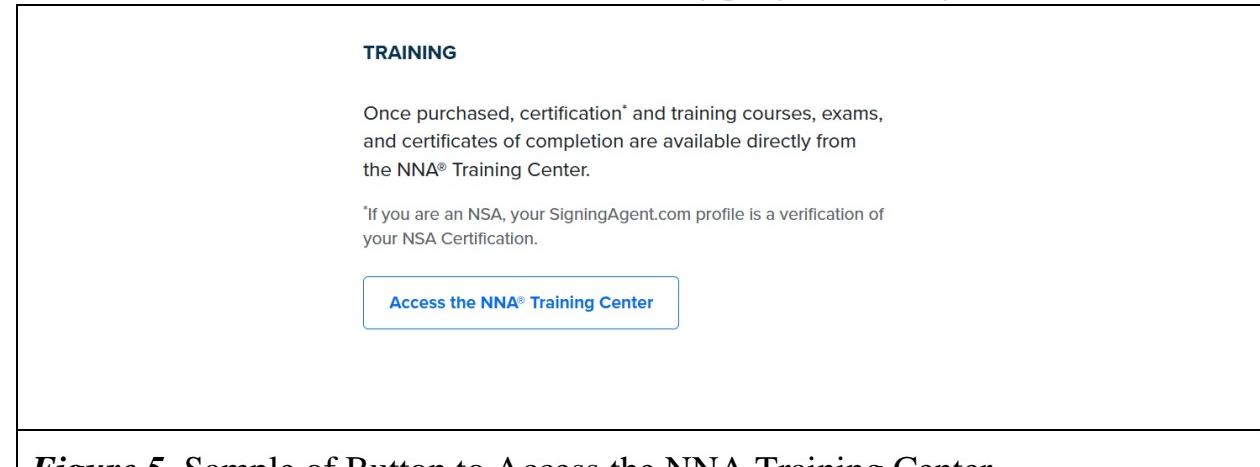
25 **The Website Does Not Host the Online Education and Training Programs**

26 24. As mentioned, the NNA Website does not host or deliver the
27 educational and training programs that are available on the NNA Website.

28 25. Rather, those programs are hosted by an independent third-party

1 platform called “Crowd Wisdom.”

2 26. After obtaining an online education or training program on the
3 Website, the user accesses the Online Training program through a link:



10 **Figure 5**, Sample of Button to Access the NNA Training Center

11 27. When the user clicks the link, they are redirected to Crowd Wisdom's
12 website (mycrowdwisdom.com).

13 28. The first-time a user clicks a link to access content on Crowd Wisdom's
14 website, the Crowd Wisdom's Privacy Policy pops-up on the screen:



26 **Figure 6**, CrowdWisdom Consent Page

27 29. As indicated in **Figure 6**, above, a user cannot access the Crowd
28

1 || Wisdom platform unless they affirmatively click “Accept.”

2 30. Once on Crowd Wisdom's website, the user can then access the
3 education programs they purchased from the NNA.

4 31. The Meta Pixel is not deployed on the Crowd Wisdom Platform at all.

Further Investigation into Ms. Turner

6 32. As part of my investigation into Ms. Turner, and at the direction of my
7 Counsel, I also conducted research into Ms. Turner's public presence on the internet
8 and social media websites.

9 33. My investigation revealed Ms. Turner's LinkedIn Profile. A true and
10 accurate copy of her profile as of March 3, 2025 is attached as **Exhibit 1**.

11 34. Ms. Turner lists her professional title as: “Mobile Notary, **Loan**
12 **Signing Agent**, and Certified Notary Trust Delivery Agent (CNTDA)”:

Teresa Turner · 3rd

Mobile Notary, Loan Signing Agent, and Certified Notary Trust Delivery Agent (CNTDA)

Figure 7, Snapshot of Ms. Turner’s Public LinkedIn Page (Header) (Ex. 1 at 1 (emphasis added))

35. Ms. Turner also publicly lists the NNA as one of her “interests”:

Interests

[Companies](#) [Groups](#)

 American Bar Association
289,431 followers
[+ Follow](#)

 National Notary Association
61,960 followers
[+ Follow](#)

[Show all companies →](#)

Figure 8, Snapshot of Ms. Turner’s Public LinkedIn Page (Interests Section)

36. A true and accurate copy of the “Licenses & Certifications [sic]” section of Ms. Turner’s LinkedIn Page as of March 3, 2025 is attached as Exhibit 2.

37. Under her “Licenses and Certifications,” Ms. Turner publicly lists “Loan Signing Agent, National Notary Association”:

[Licenses & certifications](#)

 **Certified Notary Trust Delivery Agent**
Notary Coach
Issued Oct 2023

 **Credential Renderer.pdf**
Certified Notary Trust Delivery Agent

 **Notary Public Commission**
California Secretary of State
Issued Nov 2021 · Expires Nov 2025

 **Loan Signing Agent**
National Notary Association

Figure 9, Snapshot of Ms. Turner’s Public LinkedIn Page (“Licenses and certifications” Section) (Ex. 2)

38. As shown above, Ms. Turner's profile includes a picture of the exact certificate she received from the NNA following the completion of the online NSA Certification program that she obtained from the NNA.

39. My investigation also revealed Ms. Turner's Facebook Profile. A true and accurate copy of her profile as of March 5, 2025 is attached as **Exhibit 3**.

40. On her Facebook profile, she identifies herself as a “Loan Signing Agent.” Ex. 5 at 1. As explained above, this is the exact certification from the only program that she purchased from the NNA (the NSA Certification). Ms. Turner’s Facebook profile also links to the website www.lady-and-the-stamp.com, which she identifies as her business. *Id.*

41. A true and accurate copy of Ms. Turner's business website located at, www.lady-and-the-stamp.com is attached as **Exhibit 4**.

42. On her website, Ms. Turner once again identifies herself as a “certified loan signing agent.” Again, this is the exact certification from the only program that she purchased from the NNA (the NSA Certification):

Serving San Luis Obispo County. Commissioned mobile notary, **Certified Loan Signing Agent**, and Certified Notary Trust Delivery Agent. Call or Text 1-805-769-6161 today for more information.



Notarization of Legal Documents

Notary services provided for a variety of legal documents including affidavits, deeds, contracts, and more. Experienced and professional notary public will ensure that the document is signed and notarized according to the legal requirements.



Loan Signing

Mortgage signing services for lenders, title companies, and signing agencies. **Certified** **loan signing agent** will ensure that all the necessary documents are signed and notarized correctly.



Estate Planning Docs

Certified notary trust delivery
services for your estate
planning peace of mind.

Figure 10, Snapshot of Ms. Turner’s Website (Ex. 4 (highlights added))

43. In closing, the NNA seeks to serve its notary members by supporting

1 their needs, including offering education and training programs. Lawsuits like Ms.
2 Turner's jeopardize the NNA's ability to fulfill this important role.

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5 Executed on: March 7, 2025

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By: /s/ Robert Clarke
Robert Clarke
Chief Financial Officer / VP Finance
National Notary Association

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Exhibit 1



Teresa Turner | Notary Public

ID #99

Home

My Network

Jobs

Messaging

Notifications

Me



For Business ▾

Get hired faster

Premium free



Teresa Turner · 3rd

Mobile Notary, Loan Signing Agent, and Certified Notary Trust Delivery Agent (CNTDA)



- Lady and the Stamp



- Santa Barbara City College

Atascadero, California, United States · [Contact info](#)

371 connections

[Message](#)[+ Follow](#)[More](#)

About

Notary Public and Loan Signing Agent.

Services

Notary

[Request services](#)[Show all services →](#)

Featured

Link



Web content for Tulsa kitchen and bath.
tulsakitchenandbath.com

Remodeling a kitchen or bathroom in Tulsa OK, on your own can be expensive and time-consuming. Instead, contact us for your kitchen or bathroom remodel in Tulsa.

Link



How to Have Safe Property Inspections During a Pandemic ...
ApplyConnect

During a pandemic, we have to take precautions with property inspections. While tenants still need to move during these times, it's business as usual.

Docu...



GSBR

3.0-p

This I used
broke
team

Activity

372 followers

[Posts](#)[Comments](#)[Events](#)

Teresa Turner • 3rd+
Mobile Notary, Loan Signing Agent, and more
1w • \$

Please come and support my ribbon cutting. Thank you.



Thu, Jan 23, 4:30 PM - 5:30 PM PST

[View event](#)

Ribbon Cutting

Atascadero, US

[Show all posts →](#)

Teresa Turner
Mobile Notary, Loan Signing Agent, and more
1yr • \$

I'm happy to share that I've received my certification: Certified Notary (CNTDA) from [Notary Connection](#).



Celebrating a

2 · 3 comments

Experience



Lady and the Stamp

3 yrs 3 mos

Atascadero, California, United States

• **Notary Public and Loan Signing Agent**

Self-employed

Nov 2021 - Present · 3 yrs 3 mos

On-site

Notary Public and Loan Signing Agent.

❖ Real Estate Transactions

• **Owner**

Self-employed

Nov 2021 - Present · 3 yrs 3 mos

Hybrid

❖ Notary, Signing Agent and +1 skill

• **Business Owner**

Nov 2021 - Present · 3 yrs 3 mos



Freelance Writer

Teresa Turner · Freelance

Jan 1990 - Nov 2021 · 31 yrs 11 mos

Atascadero, CA

Various writing assignments. Web content, press releases, journalism, indexing, and creative writing for local publications. A few samples are...



ID #:101

**Writer at Teresa Turner**

Teresa Turner · Freelance

Jan 1988 - Nov 2021 · 33 yrs 11 mos

Atascadero, CA

Technical Writer for the Multiple Listing Service (MLS) user's guide. Writer for the Broker & Agent magazine and the South Bay (LA) Associa ...see more

(GSBRMLS)
Matrix Training Manual
for the Multiple Listing
Service (MLS)**GSBRMLS Matrix Training Manual 3.0****Real Estate Agent, Community Association Manager**

Independent Contractor

Mar 2003 - Feb 2015 · 12 yrs

Paso Robles, CA

Managed a portfolio of eight community associations. Budgeting, vendor bidding, and insurance administration. Assisted homeowners and...

**Executive Assistant (part time)**

Haight Properties

Sep 2009 - Sep 2011 · 2 yrs 1 mo

Santa Barbara, CA

Maintain multi-family property insurance and reports. Assist in foreclosures, law suits, refinance and acquisitions for a General Partner of Investors....

[Show all 9 experiences →](#)**Education****Santa Barbara City College**

Some College - Computer Science and Theater

1983 - 1985

Licenses & certifications*Notary Coach***Certified Notary Trust Delivery Agent**

Notary Coach

Issued Oct 2023

**Credential Renderer.pdf**

Certified Notary Trust Delivery Agent

**Notary Public Commission**

California Secretary of State

Issued Nov 2021 · Expires Nov 2025

[Show all 3 licenses & certifications →](#)**Volunteering****Real Estate and CrowdFunding**

Paso Robles Food Co-op

Apr 2013 - Mar 2019 · 6 yrs

Education

One of the original founders, I have been involved with the steering committee and the marketing, outreach, and business sub-committees. Als...

**Board of Directors, Local Director**

Paso Robles Association of Realtors

Jan 2013 - Dec 2014 · 2 yrs

ID #:102

Skills

Notary



Owner at Lady and the Stamp

Signing Agent



Owner at Lady and the Stamp

[Show all 29 skills →](#)

Recommendations

[Received](#)[Given](#)

Nothing to see for now

Recommendations that Teresa receives will appear here.

Courses

Certificates for Professional Technical Writing Technical

Associated with Dynamic Systems Inc.*

Certificates of Completion of Multiple Listing Service (MLS) Training

Associated with Independent Contractor

[Show all 5 courses →](#)

Honors & awards

Member of the Year

Issued by South Bay (LA) Association of Realtors · Oct 2005

Associated with Independent Contractor

Outstanding Service and Dedication Award

Issued by South Bay (LA) Association of Realtors · Oct 2005

Associated with Independent Contractor

For my duties at the South Bay (LA) Association of Realtors:
Multiple Listing Service (MLS) trainer....[Show all 3 honors & awards →](#)

Interests

[Companies](#)[Groups](#)**American Bar Association**

289,431 followers

[+ Follow](#)**National Notary Association**

61,960 followers

[+ Follow](#)[Show all companies →](#)

Exhibit 2



Home



My Network



Jobs



Messaging



Notifications



Me



For Business ▾



Retry Premium for \$0



Teresa Turner

Mobile Notary, Loan Signing Agent, and Certifi...

More

+ Follow

Message

← Licenses & certifications

Certified Notary Trust Delivery Agent

Notary Coach
Notary Coach
Issued Oct 2023



Credential Renderer.pdf
Certified Notary Trust Delivery Agent



Notary Public Commission

California Secretary of State
Issued Nov 2021 · Expires Nov 2025



Loan Signing Agent
National Notary Association



Chirag H., explore relevant opportunities
with gWorks

Get the latest jobs and industry news

Follow

More profiles for you

Promoted ...



Thousands Trust Actalent
Thousands trust Actalent's engineering
and science services.



Orhan & 3 other connections also
follow Actalent



Study Digital Forensics
Enhance Your Career w/a Digital
Forensics Grad Certificate.
Online/OnCampus

About

- Professional Community Policies
 - Privacy & Terms
 - Sales Solutions
 - Safety Center
- Accessibility
 - Careers
 - Ad Choices
 - Mobile

Talent Solutions

- Marketing Solutions
- Advertising
- Small Business

Questions?

Visit our Help Center.

Manage your account and privacy

Go to your Settings.

Recommendation transparency

Learn more about Recommended Content.

Select Language

English (English)

Exhibit 3



Teresa Turner

856 friends

Add friend

Message



Posts

About

Friends

Photos

Videos

Reels

More ▾

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Intro

Notary Public, Loan Signing Agent, and Certified Notary Trust Delivery Agent

Notary Public • Loan Signing Agent at Lady & the Stamp

Studied Computer science and theater. at Santa Barbara City College

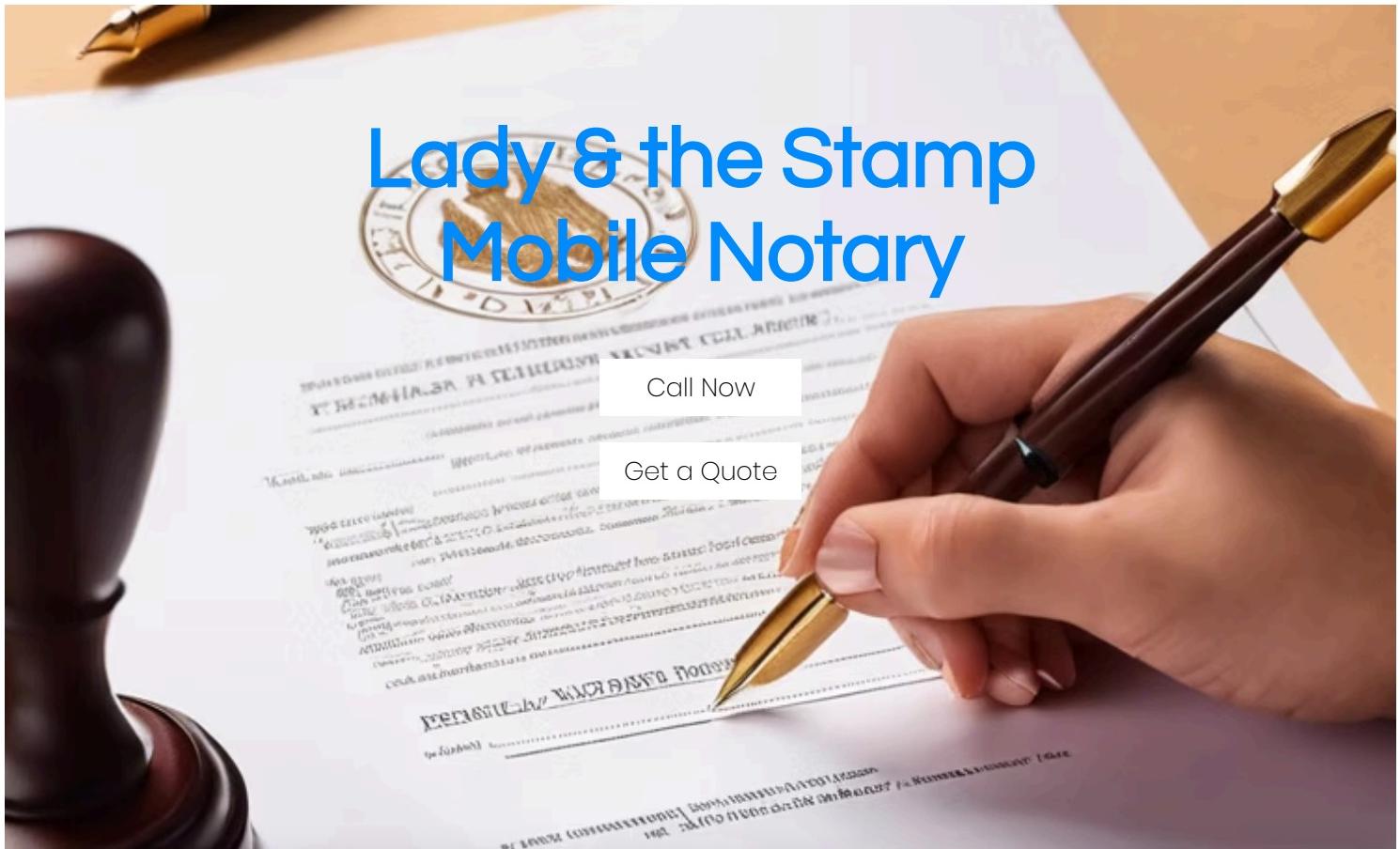
Lives in Atascadero, California

Single

Joined on June 2009

Followed by 487 people

Exhibit 4



Professional Mobile Notary Services in San Luis Obispo County

Lady and the Stamp is a commissioned mobile notary, certified loan signing agent, and certified notary trust delivery agent serving San Luis Obispo County. I provide convenient, reliable, and affordable mobile notary services at your doorstep. Call or text 1-805-769-6161 today for more information.

Read More



Serving San Luis Obispo County. Commissioned mobile notary, Certified Loan Signing Agent, and Certified Notary Trust Delivery Agent. Call or Text 1-805-769-6161 today for more information.



Notarization of Legal Documents

Notary services provided for a variety of legal documents including affidavits, deeds, contracts, and more. Experienced and professional notary public will ensure that the document is signed and notarized according to the legal requirements.



Loan Signing

Mortgage signing services for lenders, title companies, and signing agencies. Certified loan signing agent will ensure that all the necessary documents are signed and notarized correctly.



Estate Planning Docs

Certified notary trust delivery services for your estate planning peace of mind.



Signature Witnessing

We offer notary services for power of attorney documents. Our notary public will ensure that the document is signed and notarized according to the legal requirements.



We provide notary services for health care directives. Our notary public will ensure that the document is signed and notarized according to the legal requirements.



Notarial Acknowledgement

We offer other mobile notary services including vehicle title transfers, jail notary services, and more. Contact us to discuss your specific needs.

[See More](#)